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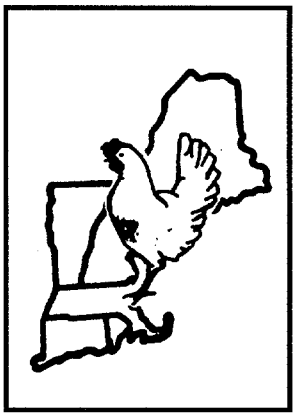

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April 19, 2000

FDA/Dockets Management Branch (HFA-305)
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Docket No. 00N-0504

The New England Poultry Association submits comments below on the Proposed Egg Safety Action Plan, as discussed at public hearings March 30, 2000 and April 6, 2000.

The New England Poultry Association is a 501 (c) (6) trade association consisting of commercial egg producers and also broiler-breeder firms, together with allied suppliers. Virtually every commercial egg production firm in the New England states is a member; upwards of 98% of the egg production in the New England region is represented amongst the membership of the New England Poultry Association. These comments were authorized by the New England Poultry Association Directors at their meeting of March 23, 2000. They have been reviewed by major commercial egg production firms and are submitted by the Association's Executive Director, William Bell. The offices of the New England Poultry Association are physically located at 77 Water Street, Hallowell, Maine 04347.

The New England Poultry Association has neither the expertise nor the inclination to comment in detail on the general questions raised by the Egg Safety Action Plan. Many of these questions are best answered by United Egg Producers, together with poultry scientists and veterinarians.

However, New England egg producers have extensive experience in egg safety surveillance with regard to *Salmonella Enteritidis*. Food-borne illness outbreaks relating to eggs and salmonella were first discussed with the industry, by Dr. Maurice Potter of the Centers for Disease Control, at the New England Poultry Health Conference in 1987. New England consumers and media are very conscious of food safety. Egg producers therefore promptly joined in a voluntary, regional, egg quality assurance program. This New England program has become the basis for subsequent voluntary programs in other states and regions. This program works. **Ever since the New England SE Risk Reduction and Surveillance Program was initiated twelve years ago, there have been no confirmed trace-backs of salmonella enteritidis to New England producers.**

Our New England program is based upon placing clean birds in clean houses. This is accomplished by having good management systems in place. There must be a stringent rodent control program. The chicks placed must be s.e.-free. Any building testing environmentally positive must, when empty, be thoroughly cleaned and disinfected, and must be inspected by the state veterinarian before birds are brought back in. Producers are required to make a substantial commitment of company time and resources to implement this kind of management. In return for this commitment, **producers must be assured that they will not be subjected to the "Russian Roulette" policy of egg testing.**

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Egg testing is of very dubious utility. An egg quality program which utilizes egg testing and, if eggs are found to be possible, requires diversion to pasteurization is an unproven program. Diversion does not remove risk. Subsequent to egg diversion, the next flock in the building might also produce s.e.-positive eggs. Egg safety effort and resources should instead be directed at proper management strategies, including the testing of pullets, and testing at the end of the lay cycle. Testing **during** the egg cycle, with potential diversion, is a hit-and-miss approach, and diverts attention from maintaining good management.

In addition, diversion is not an acceptable economic strategy for New England producers. Brown eggs are the primary product of New England egg farms. These eggs are produced and sold at higher cost than white eggs. Diversion programs, for which producers receive payment regardless of shell color, place brown egg producers at a serious competitive disadvantage on the basis of price alone.

Diversion also places New England brown egg producers at serious risk of permanently losing market share. Brown eggs can seldom be purchased from outside of New England, and are often in very short supply within the region. New England producers have balanced their supply with demand. If diversion of eggs were required, a New England producer would simply be unable to meet marketplace commitments. This could well result in permanent loss of market share, and the demise of the producer.

New England producers therefore emphatically disagree with proposals advanced by the Egg Safety Action Plan which use egg testing and diversion as a management tool. This is a tool which we believe is far inferior to proper management of incoming birds and the environment in which they are placed. Furthermore, it is a management tool which, if mandatory, would place New England producers in an untenable economic position.

New England egg producers will support an Egg Safety Action Plan which is based upon sound sanitation and management practices. We look forward to working with regulatory agencies to refine long-term management strategies. However, we believe egg testing and diversion to be short-term strategies posing substantial risks to our members without providing sustained egg safety benefits to consumers.

Attached is an outline of the New England SE Risk Reduction Program. This program is extensive, and will continue to be modified and strengthened as experience indicates. New England egg producers work with Extension personnel and state veterinarians to specify management and implementation details of this program, as applied to the different production set-up of each individual egg production facility. **In the strongest possible terms, we urge that the federal Egg Safety Action Plan respect what we have accomplished and are continuing to better implement in New England.** To instead require adoption of a new program which includes the economically threatening and scientifically debatable element of egg diversion would be extremely disruptive, and therefore contrary to the very public health concerns which we, as producers, share with the President's Council of Food Safety.

University of Maine
Cooperative Extension

New England SE Risk Reduction and Surveillance Program for Commercial Egg-Type Flocks **Basic Version**

Code	Sample Period	Type of Sample	Action if any Test is Positive	Recommendations
A	**Pullets on arrival**	**Meconium** Swab liner from every 5th chick box.	1. Inform hatchery and NPIP. 2. Check 30 chicks - organ & gut culture. 3. Trap mice and culture for SE. 4. Check environment at 2-4 and 10-18 weeks; *if* any of the tests are positive and flock is maintained, check: - environment of layer house at 25 weeks (4 weeks after housing) and at 35 weeks; *if* - both tests are negative, laying flock is released from testing; *if* - any test is positive, culture 500 eggs every 2 weeks for total of 4 lots; *if* - all egg tests are negative, flock is released; *if* - any egg test is positive for SE, send eggs from the flock to the breakers.	**Option A:** Disposal of the flock. **Option B:** (If Option A is not chosen)1.a.Implement biosecurity measures that reduce the spread of SE to other flocks. b. Implement and monitor effective rodent control. Check rodent index at least once monthly. Maintain index of 0-1. c. Vaccinate twice at an interval of 4 weeks and before transfer to the laying house with SE bacterin. d. Consult with service veterinarian on other service options. 2. Clean, disinfect, inspect and test pullet house before restocking with SE clean replacement pullet flock. 3. a. Implement and maintain biosecurity and rodent control in the layer house in which this flock is placed. b. Vaccinate all future replacement flocks if this flock is going in a multiple house egg laying complex until all houses and mice test SE negative.
B	**2-4 weeks of age**	Environmental samples - Drag swabs - 30 mice, *If* index is 2 or greater.	Follow the same action as outlined under Code A (2-4).	See recommendations under Code A.
C	**10-18 weeks of age** *If* flock was not tested at 2-4 weeks of age.	Environmental samples - Drag swabs - 30 mice, *If* index is 2 or greater.	Follow protocol of layer house testing as outlined in Code A (positive meconium test).	See **Option B** of recommendations under Code A.
D	**4 weeks before termination or molt induction of the laying flock**	Environmental samples - Manure drag swabs (drop board or pit) or manure scraper swabs - Floor and fan blades - Egg conveyor equipment - 30 mice, *If* index is 2 or greater.	1. Send the flock to slaughter within 2 weeks after confirmation, or send eggs to breakers or test 500 eggs every 2 weeks. Eggs shall go to the breakers if any egg test is positive. **2. Rodent seal building.** **3. Reduce mice to index of 0. Eliminate other pests.** **4. Thoroughly clean and disinfect laying house.** **5. State veterinarian certifies adequate C&D, and rodent control and rodent sealing.** 6. Implement biosecurity.	1. Implement biosecurity measures that reduce spread of SE to other flocks until the house has been released for restocking. Maintain effective rodent control. 2. Vaccinate all future replacement flocks on the premise until house environments and mice test negative for SE.

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